

Remarks

This Application has been carefully reviewed in light of the Office Action mailed October 20, 2005. Applicants again believe all pending claims are allowable without amendment and respectfully provide the following remarks. Applicants respectfully request reconsideration and allowance of all pending claims.

I. The Claims are Allowable over the Proposed *Keller-Lidinsky* Combination

The Examiner rejects Claims 1-3, 5, 7-13, 15-19, 21, 23-28, 31-33, 35-37, 39-42, and 44-46 under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent 6,504,844 to Keller-Tuberg (“*Keller*”) in view of U.S. Patent 4,896,319 to Lidinsky, et al. (“*Lidinsky*”). Applicants respectfully disagree and discuss independent Claim 1 as an example.

A. The Proposed *Keller-Lidinsky* Combination Fails to Disclose, Teach, or Suggest Each and Every Limitation Recited in Claim 1

Keller, whether considered alone or in combination with *Lidinsky*, fails to disclose, teach, or suggest at least the following limitations recited in Claim 1.

At a minimum, the proposed *Keller-Lidinsky* combination does not disclose, teach, or suggest the following limitations recited in Claim 1:

- a memory . . . operable to store path information for the plurality of subscribers, the path information for the particular subscriber identifying a virtual circuit that is pre-assigned to the particular subscriber for communicating with the access server; and
- a processor coupled to the memory and operable to:
 - compare the path information for the particular subscriber [identifying a virtual circuit that is pre-assigned to the particular subscriber for communicating with the access server] to the particular virtual circuit used to receive the communication from the particular subscriber; and
 - identify the particular subscriber for connection to the second communication network based on the comparison.

The Examiner acknowledges that *Keller* does not disclose these limitations. (Office Action, Page 3) However, the Examiner argues that *Lidinsky* discloses these limitations. (Office Action, Pages 3-4) Applicants respectfully disagree.

For example, *Lidinsky* fails to disclose, teach, or suggest “a memory . . . operable to store path information for the plurality of subscribers, the path information for the particular subscriber identifying a virtual circuit that is pre-assigned to the particular subscriber for communicating with the access server,” as recited in Claim 1. Applicants address below each portion of *Lidinsky* cited by the Examiner as allegedly disclosing these limitations of Claim 1.

Source checker table 308, which the Examiner cites as allegedly disclosing “a memory . . . operable to store path information for the plurality of subscribers,” as recited in Claim 1, merely includes a list of authorized name/group pairs for each port connected to the network interface module (NIM) that sends the data stream to the external link handler (XLH) for that source checker. (Column 63, Lines 40-43; *see also* Office Action, Page 3) Source checker table 308 of *Lidinsky* does not store ***path information*** for the plurality of subscribers [***the path information for the particular subscriber identifying a virtual circuit that is pre-assigned to the particular subscriber for communicating with the access server***], as recited in Claim 1. For example, a port, as disclosed in *Lidinsky*, is not “path information,” as recited in Claim 1, and it certainly does not identify a virtual circuit that is pre-assigned to the particular subscriber for communicating with the access server, as recited in Claim 1.

Table 360 of authorization database 351, which the Examiner cites as allegedly disclosing “a memory . . . operable to store path information for the plurality of subscribers,” as recited in Claim 1, merely provides for each user identification 362, the password 361, the group 363 accessible using that password, a list of ports, and, for special cases, directory numbers 364 from which that user may transmit and/or receive, and the type of service 365, i.e., receive only, transmit only, or receive and transmit. (Column 62, Lines 57-63; *see also* Office Action, Page 3) Table 360 of *Lidinsky* does not store “***path information*** for the plurality of subscribers [***the path information for the particular subscriber identifying a virtual circuit that is pre-assigned to the particular subscriber for communicating with the access server***],” as recited in Claim 1. For example, the list of ports, as disclosed in *Lidinsky*, is not “path information,” as recited in Claim 1, and it certainly does not identify a virtual circuit that is pre-assigned to the particular subscriber for communicating with the access server, as recited in Claim 1.

The Examiner cites authorization database 351 (Figure 15) and Column 62, Lines 23-33 of *Lidinsky* as allegedly disclosing “the path information for the particular subscriber identifying a virtual circuit that is pre-assigned to the particular subscriber for communicating with the access server,” as recited in Claim 1. The cited portion of *Lidinsky* discloses an authorization database of an operation, administration, and maintenance (OA&M) system for authorizing users in response to a login request. (Column 62, Lines 24-27) According to *Lidinsky*, this database is arranged so that users cannot access restricted virtual networks of which they are note members. (Column 62, Lines 29-32) However, nowhere do the cited portions of *Lidinsky* disclose, teach, or suggest the path information for a particular subscriber that identifies a virtual circuit that is pre-assigned to the particular subscriber for communicating with the access server, as recited in Claim 1.

A virtual **network** (as disclosed in *Lidinsky*) is not a virtual **circuit** (as recited in Claim 1). *Lidinsky* defines a virtual network as a set of users who require protection from outsiders, stating that such users “can conveniently be grouped into virtual networks.” (Column 61, Line 66-Column 62, Line 1) In other words, *Lidinsky* apparently defines a virtual network as a group of users. An example virtual network disclosed in *Lidinsky* is a company. (Column 62, Lines 3-6) A virtual network (as disclosed in *Lidinsky*) is simply not the same as a “virtual circuit” (as recited in Claim 1). Moreover, the virtual network disclosed in *Lidinsky* is completely unrelated to communicating with an access server; whereas, in Claim 1 the virtual circuit that is pre-assigned to the particular subscriber is for communicating with the access server. Thus, the information stored in the user authorization table of the authorization database disclosed in *Lidinsky* is not “path information for [a] particular subscriber identifying a virtual circuit that is pre-assigned to the particular subscriber for communicating with the access server,” as recited in Claim 1.

As another example, *Lidinsky* fails to disclose, teach, or suggest “a processor . . . operable to . . . compare the path information for the particular subscriber [identifying a virtual circuit that is pre-assigned to the particular subscriber for communicating with the access server] to the particular virtual circuit used to receive the communication from the particular subscriber,” as recited in Claim 1. The Examiner cites Column 63, Lines 22-32 of

Lidinsky as allegedly disclosing these limitations. (Office Action, Page 3) Applicants respectfully disagree.

The cited portion of *Lidinsky* relates to a login procedure. A user communicates a login request message to a metropolitan area network (MAN), the login request message comprising a header that includes a password, the type of login service being requested, the MAN group, the MAN name, and the port number. (Column 63, Lines 12-20) The login data, which includes the MAN name, the requested MAN group name (virtual network name), and the password, are compared against the login authorization database 351 to check whether the particular user is authorized to access that virtual network from the physical port to which that user is connected. (Column 63, Lines 23-29) The Examiner refers in particular to “compar[ing the] virtual network name and port against the authorization database.” (Office Action, Page 3) Applicants respectfully submit that comparing a virtual network name and port against the authorization database, as disclosed in *Lidinsky*, does not disclose, teach or suggest “a processor . . . operable to . . . compare the path information for the particular subscriber [identifying a virtual circuit that is pre-assigned to the particular subscriber for communicating with the access server] to the particular virtual circuit used to receive the communication from the particular subscriber,” as recited in Claim 1.

The comparison disclosed in *Lidinsky* is different than the comparison recited in Claim 1. It appears that the Examiner equates the authorization database disclosed in *Lidinsky* with the path information for the particular subscriber recited in Claim 1 [which identifies a virtual circuit that is pre-assigned to the particular subscriber for communicating with the access server]. First, as Applicants discussed above, the authorization database disclosed in *Lidinsky* does not store “path information” as recited in Claim 1. That is, the authorization database disclosed in *Lidinsky* does not store “path information for [a] particular subscriber that identifies a virtual circuit that is pre-assigned to the particular subscriber for communicating with the access server,” as recited in Claim 1.

It is not entirely clear whether the Examiner is attempting to equate the port or the virtual network disclosed in *Lidinsky* with the virtual circuit recited in Claim 1; however, Applicants respectfully submit that neither would be appropriate. First, as discussed above, a

port (as disclosed in *Lidinsky*) may not be properly equated with a virtual circuit (as recited in Claim 1). Second, the concept of a virtual network, as disclosed in *Lidinsky*, may not be properly equated with a virtual circuit, as recited in Claim 1. The concept of a virtual network disclosed in *Lidinsky* is merely a set of users who require protection from outsiders (e.g., a company). (Column 61, Line 66-Column 62, Line 6) Thus, the cited portions of *Lidinsky* fails to disclose, teach, or suggest the “path information” portion of the comparison recited in Claim 1.

The cited portions of *Lidinsky* also fail to disclose, teach, or suggest “the particular virtual circuit used to receive the communication from the particular subscriber,” as recited in Claim 1. As allegedly disclosing this portion of the comparison recited in Claim 1, it appears that the Examiner attempts to equate either the virtual network name or the port disclosed in *Lidinsky* with this limitation. Applicants respectfully submit that neither is appropriate. First, as discussed above, a port (as disclosed in *Lidinsky*) may not be properly equated with a virtual circuit (as recited in Claim 1). Second, the concept of a virtual network, as disclosed in *Lidinsky*, may not be properly equated with a virtual circuit, as recited in Claim 1. The concept of a virtual network disclosed in *Lidinsky* is merely a set of users who require protection from outsiders (e.g., a company). (Column 61, Line 66-Column 62, Line 6) Thus, the cited portions of *Lidinsky* fails to disclose, teach, or suggest the “particular virtual circuit used to receive the communication from the particular subscriber” portion of the comparison recited in Claim 1.

Thus, the cited portions of *Lidinsky* fail to disclose, teach, or suggest both “the path information for the particular subscriber [identifying a virtual circuit that is pre-assigned to the particular subscriber for communicating with the access server]” and “the particular virtual circuit used to receive the communication from the particular subscriber,” as recited in Claim 1. Additionally, *Lidinsky* certainly fails to disclose, teach or suggest “a processor . . . operable to . . . compare the path information for the particular subscriber [identifying a virtual circuit that is pre-assigned to the particular subscriber for communicating with the access server] to the particular virtual circuit used to receive the communication from the particular subscriber,” as recited in Claim 1.

Moreover, at least because *Lidinsky* fails to disclose, teach, or suggest a processor operable to “compare the path information for the particular subscriber to the particular virtual circuit used to receive the communication from the particular subscriber,” *Lidinsky* necessarily fails to disclose, teach, or suggest that the processor is operable to “identify the particular subscriber for connection to the second communication network *based on the comparison.*”

For at least these reasons, Applicants respectfully submit that the proposed *Keller-Lidinsky* combination fails to disclose, teach, or suggest each and every limitation recited in independent Claim 1. For at least certain analogous reasons, Applicants respectfully submit that the proposed *Keller-Lidinsky* combination fails to disclose, teach, or suggest each and every limitation recited in independent Claims 11, 18, 26, 32, 36, and 40.

B. The Proposed *Keller-Lidinsky* Combination is Improper

The rejection of Applicants’ claims is also improper because the Examiner has not shown the required teaching, suggestion, or motivation in *Keller*, *Lidinsky*, or in the knowledge generally available to those of ordinary skill in the art at the time of the invention to combine or modify the *Keller* or *Lidinsky* in the manner the Examiner proposes. The rejected claims are allowable for at least this additional reason.

1. The Obviousness Standard

The question raised under 35 U.S.C. § 103 is whether the prior art taken as a whole would suggest the claimed invention taken as a whole to one of ordinary skill in the art at the time of the invention. Accordingly, even if all elements of a claim are disclosed in various prior art references, which is certainly not the case here as discussed above, the claimed invention taken as a whole cannot be said to be obvious without some reason given in the prior art why one of ordinary skill at the time of the invention would have been prompted to modify the teachings of a reference or combine the teachings of multiple references to arrive at the claimed invention. It is clear based at least on the many distinctions discussed above that the proposed *Keller-Lidinsky* combination does not, taken as a whole, suggest the claimed invention, taken as a whole. Respectfully, it appears to Applicants that the Examiner

has merely pieced together disjointed portions of references, with the benefit of hindsight using Applicants' claims as a blueprint, in an attempt to reconstruct Applicants' claims.

The governing Federal Circuit case law makes this strict legal standard clear.¹ According to the Federal Circuit, "a showing of a suggestion, teaching, or motivation to combine or modify prior art references is an essential component of an obviousness holding." *In re Sang-Su Lee*, 277 F.3d 1338, 1343, 61 U.S.P.Q.2d 1430, 1433 (Fed. Cir. 2002) (quoting *Brown & Williamson Tobacco Corp. v. Philip Morris Inc.*, 229 F.3d 1120, 1124-25, 56 U.S.P.Q.2d 1456, 1459 (Fed. Cir. 2000)). "Evidence of a suggestion, teaching, or motivation . . . may flow from the prior art references themselves, the knowledge of one of ordinary skill in the art, or, in some cases, the nature of the problem to be solved." *In re Dembicza*, 175 F.3d 994, 999, 50 U.S.P.Q.2d 1614, 1617 (Fed. Cir. 1999). However, the "range of sources available . . . does not diminish the requirement for actual evidence." *Id.* *Although a prior art device "may be capable of being modified to run the way the apparatus is claimed, there must be a suggestion or motivation in the reference to do so."* *In re Mills*, 916 F.2d at 682, 16 U.S.P.Q.2d at 1432 (emphasis added). *See also In re Rouffet*, 149 F.3d 1350, 1357, 47 U.S.P.Q.2d 1453, 1457-58 (Fed. Cir. 1998) (*holding a prima facie case of obviousness not made where the combination of the references taught every element of the claimed invention but did not provide a motivation to combine*); *In Re Jones*, 958 F.2d 347, 351, 21 U.S.P.Q.2d 1941, 1944 (Fed. Cir. 1992) ("Conspicuously missing from this record is any evidence, other than the PTO's speculation (if that can be called evidence) that one of ordinary skill in the herbicidal art would have been motivated to make the modification of the prior art salts necessary to arrive at" the claimed invention.). Even a determination that it would have been obvious to one of ordinary skill in the art at the time of the invention to try the proposed modification or combination is not sufficient to establish a *prima facie* case of obviousness. *See In re Fine*, 837 F.2d 1071, 1075, 5 U.S.P.Q.2d 1596, 1599 (Fed. Cir. 1988).

In addition, the M.P.E.P. and the Federal Circuit repeatedly warn against using an applicant's disclosure as a blueprint to reconstruct the claimed invention. For example, the M.P.E.P. states, "*The tendency to resort to 'hindsight' based upon applicant's disclosure is*

¹ Note M.P.E.P. 2145 X.C. ("The Federal Circuit has produced a number of decisions overturning obviousness rejections due to a lack of suggestion in the prior art of the desirability of combining references.").

often difficult to avoid due to the very nature of the examination process. However, impermissible hindsight must be avoided and the legal conclusion must be reached on the basis of the facts gleaned from the prior art.” M.P.E.P. § 2142 (emphasis added). The governing Federal Circuit cases are equally clear. “A critical step in analyzing the patentability of claims pursuant to [35 U.S.C. § 103] is casting the mind back to the time of invention, to consider the thinking of one of ordinary skill in the art, guided only by the prior art references and the then-accepted wisdom in the field. . . . Close adherence to this methodology is especially important in cases where the very ease with which the invention can be understood may prompt one ‘to fall victim to the insidious effect of a hindsight syndrome *wherein that which only the invention taught is used against its teacher.*’” *In re Kotzab*, 217 F.3d 1365, 1369, 55 U.S.P.Q.2d 1313, 1316 (Fed. Cir. 2000) (citations omitted; emphasis added). In *In re Kotzab*, the court noted that to prevent the use of hindsight based on the invention to defeat patentability of the invention, this court requires the examiner to show a motivation to combine the references that create the case of obviousness. *See id. See also, e.g., Grain Processing Corp. v. American Maize-Products*, 840 F.2d 902, 907, 5 U.S.P.Q.2d 1788, 1792 (Fed. Cir. 1988). Similarly, in *In re Dembicza*k, the Federal Circuit reversed a finding of obviousness by the Board, *explaining that the required evidence of such a teaching, suggestion, or motivation is essential to avoid impermissible hindsight reconstruction of an applicant’s invention:*

Our case law makes clear that the best defense against the subtle but powerful attraction of hind-sight obviousness analysis is *rigorous application of the requirement for a showing of the teaching or motivation to combine prior art references.* Combining prior art references without evidence of such a suggestion, teaching, or motivation simply takes the inventor’s disclosure as a blueprint for piecing together the prior art to defeat patentability—the essence of hindsight.

175 F.3d at 999, 50 U.S.P.Q.2d at 1617 (emphasis added) (citations omitted; emphasis added).

2. Argument

According to the Examiner, “[i]t would have been obvious to a person [of] skill in the art at the time the invention was made to combine the teachings of Keller-Tuberg and Lidinsky because Lidinsky’s teaching of verifying the source would allow additional

protection against access of a virtual network by an unauthorized user.” (Office Action at 4) The Examiner cites *Lidinsky* in support of this assertion. (*Id.*) Applicants respectfully submit that the Examiner’s assertion that it would have been obvious to combine the teachings of *Keller* with the teachings of *Lidinsky* to purportedly arrive at Applicants’ invention is entirely insufficient to support a *prima facie* case of obviousness under 35 U.S.C. § 103(a) under the M.P.E.P. and the governing Federal Circuit case law.

It appears that the Examiner has merely proposed an alleged advantage of combining *Lidinsky* with *Keller* (an advantage which Applicants do not admit could even be achieved by combining these references in the manner the Examiner proposes). While the Examiner has cited a portion of *Lidinsky* that touts an advantage of its system, the Examiner has not pointed to any portions of the cited references that would teach, suggest, or motivate one of ordinary skill in the art at the time of invention to incorporate the cited technique for identification and authentication of end user systems disclosed in *Lidinsky* with the particular high speed internet access system and method disclosed in *Keller*. In other words, the alleged advantage of the system disclosed in *Lidinsky* does not provide an explanation as to: (1) why it would have been obvious to one of ordinary skill in the art at the time of Applicants’ invention (*without using Applicants’ claims as a guide*) to modify the particular techniques disclosed in *Keller* with the cited disclosure in *Lidinsky*; (2) how one of ordinary skill in the art at the time of Applicants’ invention would have actually done so; and (3) how doing so would purportedly meet the limitations of Claim 1. Indeed, if it were sufficient for Examiners to merely point to a purported advantage of one reference and conclude that it would have been obvious to combine or modify that reference with other references simply based on that advantage (which, as should be evident from the case law discussed above, it certainly is not), then virtually any two references would be combinable just based on the fact the one reference states an advantage of its system. Of course, as the Federal Circuit has made clear and as discussed above, that is not the law.

It certainly would not have been obvious to one of ordinary skill in the art at the time of invention *to even attempt* to, let alone *to actually*, modify or combine the particular high speed internet access system and method disclosed in *Keller* with the cited technique for identification and authentication of end user systems disclosed in *Lidinsky* in the manner

proposed by the Examiner.² Applicants respectfully submit that the Examiner's attempt to modify or combine *Keller* with *Lidinsky* appears to constitute the type of impermissible hindsight reconstruction of Applicants' claims, using Applicants' claims as a blueprint, that is specifically prohibited by the M.P.E.P. and governing Federal Circuit cases.

Accordingly, since the prior art fails to provide the required teaching, suggestion, or motivation to combine *Keller* with *Lidinsky* in the manner the Examiner proposes, Applicants respectfully submit that the Examiner's conclusions set forth in the Office Action do not meet the requirements set forth in the M.P.E.P. and the governing Federal Circuit case law for demonstrating a *prima facie* case of obviousness. Applicants respectfully submit that the rejection must therefore be withdrawn.

For at least these additional reasons, Applicants respectfully submit that the proposed *Keller-Lidinsky* combination does not support a *prima facie* case of obviousness.

C. Conclusion

For at least these reasons, Applicants respectfully request reconsideration and allowance of independent Claim 1 and its dependent claims. For at least certain analogous reasons, Applicants respectfully request reconsideration and allowance of independent Claims 11, 18, 26, 32, 36, and 40 and their dependent claims.

II. Dependent Claims 4, 6, 14, 20, 22, 29, 34, 38, and 42 are Allowable

A. Dependent Claims 4, 14, 20, 29, and 42 are Allowable over the Proposed *Keller-Lidinsky-Dugan* Combination

The Examiner rejects Claims 4, 14, 20, 29, and 42 under 35 U.S.C. § 103(a) as being unpatentable over *Keller* and *Lidinsky* in view of U.S. Patent 6,788,649 to Dugan, et al. ("Dugan").

² If "common knowledge" or "well known" art is relied upon by the Examiner to combine or modify the references, Applicants respectfully request that the Examiner provide a reference pursuant to M.P.E.P. § 2144.03 to support such an argument. If the Examiner relies on personal knowledge to supply the required motivation or suggestion to combine or modify the references, Applicants respectfully request that the Examiner provide an affidavit supporting such facts pursuant to M.P.E.P. § 2144.03.

Dependent Claims 4, 14, 20, 29, and 42 depend from independent Claims 1, 11, 18, 26, and 40, respectively, which Applicants have shown above to be clearly allowable over the Examiner's proposed *Keller-Lidinsky* combination. *Dugan* fails to make up for at least the deficiencies of the proposed *Keller-Lidinsky* combination discussed above. Thus, dependent Claims 4, 14, 20, 29, and 42 are allowable at least because of they depend from allowable independent claims. Additionally, dependent Claims 4, 14, 20, 29, and 42 recite further patentable distinctions over the references cited by the Examiner. To avoid burdening the record and in view of the clear allowability of independent Claims 1, 11, 18, 26, and 40, Applicants do not specifically discuss these distinctions in this Response. However, Applicants reserve the right to discuss these distinctions in a future Response or on Appeal, if appropriate. Additionally, Applicants do not admit that the proposed *Keller-Lidinsky-Dugan* combination is even possible or that the Examiner has shown the requisite teaching, suggestion, or motivation in the cited references or in the knowledge generally available to one of ordinary skill in the art at the time of invention to combine or modify these references in the manner the Examiner proposes.

For at least these reasons, Applicants respectfully request reconsideration and allowance of dependent Claims 4, 14, 20, 29, and 42.

B. Dependent Claims 6, 22, 34, and 38 are Allowable over the Proposed *Keller-Lidinsky-Malkin* Combination

The Examiner rejects Claims 6, 22, 34, and 38 under 35 U.S.C. § 103(a) as being unpatentable over *Keller* and *Lidinsky* in view of U.S. Patent 6,061,650 to *Malkin*, et al. ("*Malkin*").

Dependent Claims 6, 22, 34, and 38 depend from independent Claims 1, 18, 32, and 36, respectively, which Applicants have shown above to be clearly allowable over the Examiner's proposed *Keller-Lidinsky* combination. *Malkin* fails to make up for at least the deficiencies of the proposed *Keller-Lidinsky* combination discussed above. Thus, dependent Claims 6, 22, 34, and 38 are allowable at least because of they depend from allowable independent claims. Additionally, dependent Claims 6, 22, 34, and 38 recite further patentable distinctions over the references cited by the Examiner. To avoid burdening the

record and in view of the clear allowability of independent Claims 1, 18, 32, and 36, Applicants do not specifically discuss these distinctions in this Response. However, Applicants reserve the right to discuss these distinctions in a future Response or on Appeal, if appropriate. Additionally, Applicants do not admit that the proposed *Keller-Lidinsky-Malkin* combination is even possible or that the Examiner has shown the requisite teaching, suggestion, or motivation in the cited references or in the knowledge generally available to one of ordinary skill in the art at the time of invention to combine or modify these references in the manner the Examiner proposes.

For at least these reasons, Applicants respectfully request reconsideration and allowance of dependent Claims 6, 22, 34, and 38.

III. No Waiver

All of Applicants' arguments and amendments are without prejudice or disclaimer. Additionally, Applicants have merely discussed example distinctions from the references cited by the Examiner. Other distinctions may exist, and Applicants reserve the right to discuss these additional distinctions in a later Response or on Appeal, if appropriate. By not responding to additional statements made by the Examiner, Applicants do not acquiesce to the Examiner's additional statements. The example distinctions discussed by Applicants are sufficient to overcome the Examiner's rejections.

Conclusion

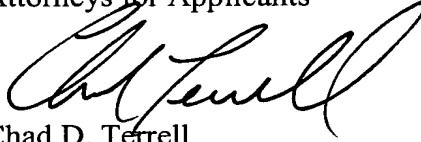
Applicants have made an earnest attempt to place this case in condition for allowance. For at least the foregoing reasons, Applicants respectfully request full allowance of all pending claims.

If the Examiner feels that a telephone conference would advance prosecution of this Application in any manner, the Examiner is invited to contact Chad D. Terrell, Attorney for Applicants, at the Examiner's convenience at (214) 953-6813.

Although Applicants believe no fees are due, the Commissioner is hereby authorized to charge any fees or credit any overpayments to Deposit Account No. 02-0384 of Baker Botts L.L.P.

Respectfully submitted,

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